



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG
F.#2010R00153

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 27, 2012

By ECF

The Honorable Kiyo A. Matsumoto
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Giuseppe Destefano
Criminal Docket No. 11-30 (KAM)

Dear Judge Matsumoto:

The government respectfully submits this letter in opposition to the defendant Giuseppe Destefano's request to modify his bond to permit him to attend a gathering at "the home of his future in-laws" on July 7, 2012 from 1:00 pm to 11:00 pm. (See Ltr. from Joseph Kilada, Esq. to the Court, dated June 26, 2012 (Docket Entry No. 854)). While the government does not object to occasional, short visits between the defendant and his immediate family, and has regularly consented to such modifications in the past, the defendant's most recent request is for a ten-hour period of time to visit with, as the government understands from defense counsel, the future in-laws of his brother's daughter (*i.e.*, Destefano's niece's fiance's parents). As set forth in the government memorandum in support of its motion for a permanent order of detention as to the defendant, a copy of which is attached as Exhibit A, the defendant's release poses a danger to the community. To address the government's concerns, the Court released the defendant only after the defendant presented a \$1,000,000 bail package with conditions of release, including home detention. (See Docket Entry No. 175).

The modification the defendant currently seeks compromises the government's ability to adequately monitor the defendant's activities to ensure the safety of the community. Accordingly, the government respectfully opposes the request.

Respectfully submitted,

LORETTA E. LYNCH
United States Attorney

By: /s/
Elizabeth Geddes
Allon Lifshitz
Gina Parlovecchio
Assistant U.S. Attorneys

cc: Joseph Kilada, Esq. (by ECF)